

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 11-172</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: March 17, 2011</b>
<b>MARISSA MARK</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. §1958(a) (conspiracy to use interstate commerce facilities in the commission of murder-for-hire - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1958(a) (use of interstate commerce facilities in the commission of murder-for-hire - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A(a)(1) (aggravated identity theft - 3 counts)</b>
	<b>:</b>	<b>18 U.S.C. §1029(a)(2), (b)(1) (attempted access device fraud)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about September 10, 2006, through on or about September 15, 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

**MARISSA MARK**

conspired and agreed, with persons known and unknown to the grand jury, to travel in, and cause another to travel in, interstate commerce, that is, from Las Vegas, Nevada to Woodland Hills, California, and to use, and cause another to use, a facility of interstate commerce, that is, the internet, with intent that a murder be committed, in violation of the laws of the State of California, that is, California Penal Code, Section 187, as consideration for a promise and agreement to pay anything of pecuniary value.

**MANNER AND MEANS**

2. It was part of the conspiracy that defendant MARISSA MARK contacted Person #1 known to the grand jury (Person #1) through a website maintained by Person #1 called “hitmanforhire.com,” and hired Person #1 to murder “A.L.R.” Defendant MARK provided Person #1 with the name, work address and work phone number of “A.L.R.,” along with photographs of “A.L.R.,” and specifically asked to have “A.L.R.” killed by being shot in the head.

3. Person #1 agreed to commit the murder of “A.L.R.” in exchange for the payment of \$37,000.

4. Defendant MARISSA MARK paid \$19,000 to Person #1 through “PayPal” payments on the internet, utilizing stolen or unauthorized credit card accounts, and agreed to pay an additional \$18,000 to Person #1 after the murder of “A.L.R.” was completed.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, defendant MARISSA MARK and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about September 10, 2006, defendant MARISSA MARK contacted Person #1 through the “hitmanforhire” web site, a web site established by Person #1 sometime prior to September 10, 2006, and said that she wanted “A.L.R.,” a woman located in California, killed. Defendant MARK provided details about “A.L.R.,” including her work address telephone number, and photographs of her, to Person #1, and said that “A.L.R.” should be killed by a shot to the head.

2. On or about September 12, 2006, Person #1 placed a telephone call to A.L.R. and made arrangements to meet with A.L.R. on September 16, 2006.

3. On or about September 13, 2006, Person #1, communicating with defendant MARISSA MARK through e-mail, agreed to travel to California and commit the murder of "A.L.R." for a total payment of \$37,000.

4. On or about September 13, 2006, defendant MARISSA MARK paid a total of \$19,000 to Person #1's "PayPal" account, an internet payment service, as part of the payment for the murder of "A.L.R."

5. On or about September 13, 2006, defendant MARISSA MARK utilized three credit card accounts without authorization to make the "PayPal" payments.

All in violation of Title 18, United States Code, Section 1958(a).

## COUNT TWO

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about September 10, 2006, defendant MARISSA MARK, while in the Eastern District of Pennsylvania, utilized the internet and e-mail services to contact Person #1, known to the grand jury, through an internet website advertising “hit men” for hire, to solicit the murder of “A.L.R.,” a woman based in California.

2. Defendant MARISSA MARK provided a full description and work address of “A.L.R.” to Person #1. Defendant MARK agreed to pay Person #1 the fee of \$37,000 to have the murder committed, and arranged to make a partial payment of the fee through PayPal, an internet payment service. Person #1 agreed to travel to California to commit the murder.

3. Defendant MARISSA MARK, utilizing three unauthorized credit cards, attempted to pay \$19,000 to the PayPal account designated by Person #1. PayPal ultimately discovered the payments were “unauthorized,” and reversed the payments.

4. On September 15, 2006, Person #1 and another person known to the grand jury visited “A.L.R.” and told her that defendant MARISSA MARK had paid them to murder her. “A.L.R.” contacted law enforcement authorities, and was not injured.

5. From on or about September 10, 2006, through on or about September 15, 2006, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **MARISSA MARK**

knowingly and intentionally caused, and aided and abetted, another to travel in interstate commerce, that is, from Las Vegas, Nevada to Woodland Hills, California, and used a facility of

interstate commerce, that is, the internet, with the intent to commit murder in violation of the laws of the State of California, that is, California Penal Code, Section 187, and agreed to pay for the commission of the murder with something of pecuniary value, that is, U.S. currency.

In violation of Title 18, United States Code, Sections 1958(a) and 2.

**COUNTS THREE, FOUR and FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about September 10, 2006, through on or about September 15, 2006, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MARISSA MARK**

knowingly used, without lawful authority, a means of identification of another person during and in relation to an attempt to knowingly and with intent to defraud use an unauthorized access device, in violation of 18 U.S.C. § 1029(a)(2), (b)(1), on three occasions, as described below for each count, each use constituting a separate offense:

COUNT	DATE	DESCRIPTION
THREE	September 12, 2006	Victim "A.V."
FOUR	September 12, 2006	Victim "G.P."
FIVE	September 12, 2006	Victim "B.B."

In violation of Title 18, United States Code, Section 1028A.

**COUNTS SIX, SEVEN and EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about September 10, 2006 through on or about September 15, 2006, in the Eastern District of Pennsylvania, defendant

**MARISSA MARK**

knowingly and with the intent to defraud attempted to use, and aided and abetted and willfully caused the use of, an unauthorized access device, that is, a credit card in the account number and name as described below for each count, each use constituting a separate offense,

COUNT	DATE	CREDIT CARD TYPE AND ACCOUNT NUMBER	NAME
SIX	September 12, 2006	American Express XXXX-XXXX-XXXX-1008	"A.V"
SEVEN	September 12, 2006	American Express XXXX-XXXX-XXXX-1039	"G.P."
EIGHT	September 12, 2006	Mastercard XXXX-XXXX-XXXX-3338	"B.B."

to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of at least \$19,000, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2),(b)(1) and 2.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**